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12 Attorneys for Plaintiff

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 DOLORES VALENZUELA, an individual;
16 ADELA FLORES, an individual;
17 RAYMUNDA MENJIVAR, an individual,
18 on behalf of themselves, all other similarly
19 situated individuals, and other current or
20 former employees,

21 Plaintiffs,

22 vs.

23 BEST-LINE SHADES, INC., a California
24 Corporation; BEST-LINE, INC., a
25 California Corporation; JILL SCHAFFER,
26 an individual; and DOES 1 through 20,

27 Defendants.

Case No.: 3:19-CV-07293-JSC

**PLAINTIFFS' AMENDED RENEWED
NOTICE OF MOTION AND MOTION
FOR DEFAULT JUDGMENT**

Before Hon. Jacqueline Scott Corley

Date: June 20, 2024

Time: 10:00 am

Courtroom: 8

1 **TO THE HONORABLE COURT AND ALL INTERESTED PARTIES AND**
2 **THEIR COUNSEL OF RECORD:**

3 PLEASE TAKE NOTICE THAT on June 20, 2024, at 9:30 a.m., or another time to be
4 determined by the Court, in Courtroom 8 of the above-captioned Court, located at 450 Golden
5 Gate Avenue, San Francisco, CA 94102, Plaintiffs Dolores Valenzuela, Adela Flores, and
6 Raymunda Menjivar (“Plaintiffs”) will, and hereby do, move for an Order Granting Default
7 Judgment against Defendants, and the Awarding of Damages, Attorney’s Fees and Costs.

8 Plaintiffs bring this Motion on the grounds that, after engaging in the litigation process to
9 the best of their abilities, Defendants have defaulted in this action against them. This Motion is
10 based on this Notice and Motion, the supporting Memorandum of Points and Authorities, the
11 Declaration of Stan Mallison, including all exhibits attached thereto, the Declaration of Plaintiff
12 Dolores Valenzuela, the Declaration of Plaintiff Adela Flores, the Declaration of Plaintiff
13 Raymunda Menjivar, the record on file herein, and any other evidence and oral argument that
14 may be presented at the hearing, and such other matters of which the Court may take judicial
15 notice.

16 Dated: May 31, 2024

MALLISON & MARTINEZ

17
18 /s/ Cody Bolce

19 By: Stan S. Mallison
20 Hector R. Martinez
21 Cody A. Bolce
22 Caroline L. Hill
23 Attorneys for Plaintiffs
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